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July 23, 2020

Via CM/ECF

Hon. Renee Marie Bumb, U.S.D.J.
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, New Jersey 08101

Re: Lutter v. JNESO, et al.
Case Number 1:19-cv-13478 (RMB)(KMW)

Dear Judge Bumb:

This office represents Defendants Phil Murphy, in his official capacity as Governor of New Jersey and Gurbir Grewal, in his official capacity as Attorney General of New Jersey ("State Defendants"). As Your Honor is aware, co-Defendants JNESO ("the Union") have moved to dismiss Plaintiff's complaint on grounds of mootness. Plaintiff have also cross-moved for declaratory judgment on the merits of the complaint. In the parties' case management conference on June 26, 2020, upon request of the State Defendants', Your Honor graciously extended the time to file opposition by thirty-days. This request came following the State Defendants' request for an initial clerk's extension, making the current return date of both motions July 27, 2020.

Since that time, my office has been inundated with COVID-19 related litigation and counseling matters, which have required urgent attention. While I have been working diligently on the State Defendants' response brief, the substantial and continuous involvement in these emergent COVID-19 related matters necessitates a request for a short seven-day extension of time, until Monday, August 3, 2020. I respectfully request that Your Honor grant the brief extension so that I may meaningfully respond to the Plaintiff's cross-motion. Counsel for Co-Defendants have consented to this request and Plaintiff's counsel takes no position.



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Thank you for Your Honor's gracious consideration of this request.

Respectfully submitted,

GURBIR S. GREWAL
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Caroline Jones
Caroline Jones
Deputy Attorney General

C: All Counsel of Record via CM/ECF